

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

YOUNG AMERICA'S FOUNDATION;
BINGHAMTON UNIVERSITY
COLLEGE REPUBLICANS; and JON
LIZAK, President of the College
Republicans of Binghamton University,

Plaintiffs,

v.

HARVEY STENGER, President of
SUNY-Binghamton, in his official and
individual capacities; BRIAN ROSE, Vice
President for Student Affairs of SUNY-
Binghamton, in his official and
individual capacities; JOHN
PELLETIER, Chief of SUNY-
Binghamton UPD, in his official and
individual capacities; COLLEGE
PROGRESSIVES, a student organization
at SUNY-Binghamton; PROGRESSIVE
LEADERS OF TOMORROW ("PLOT");
STUDENT ASSOCIATION OF
BINGHAMTON UNIVERSITY,

Defendants.

Civil Action No. 3:20-cv-822 (LEK/ML)

**Notice of Motion for Entry of Default
Judgment**

MOTION BY:	Plaintiffs Young America's Foundation, Binghamton University College Republicans, and Jon Lizak.
DATE, TIME AND PLACE OF HEARING:	May 23, 2022 at 9:30 a.m., or as soon thereafter as counsel can be heard, at the U.S. District Courthouse, Northern District of New York, James T. Foley Courthouse, 445 Broadway, Albany, NY, 12207.
SUPPORTING PAPERS:	Motion for Entry of Default Judgment, Declaration in Support of Motion and Exhibits 1-6, and Memorandum of Law.
NATURE OF ACTION:	Action seeking money damages and declaratory and injunctive relief stemming from violations of constitutional rights pursuant to the First Amendment of the U.S. Constitution, the Fourteenth Amendment's Equal Protection Clause, and under 42 U.S.C § 1985(3) for the violation of free speech rights and equal protections violations.
RELIEF DEMANDED:	Entry of default judgment against Defendant PLOT for compensatory, nominal, and punitive damages, attorneys' fees, and declaratory relief under 42 U.S.C § 1985(3) and 42 U.S.C § 1988.
APPEARANCES:	Moving Plaintiffs do not request oral argument and, unless the Court so orders, no personal appearance is necessary.

ANSWERING PAPERS:

Answering papers, if any, must be served as per NDNY Local Rule 7.1(b)(1), or as directed by the Court.

DATED: May 9, 2022

/s/ Andrew C. Hruska
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